

Caption in compliance with D.N.J. LBR 9004-1(b)

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In Re:

Champ Enterprises, LLC

Debtor

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK VICINAGE

Chapter 11

Case No. 24-10402 JKS

Hearing Date: April 9, 2024

**CERTIFICATION IN OPPOSITION TO MOTION OF WILMINGTON SAVINGS FUND
SOCIETY FOR RELIEF FROM THE AUTOMATIC STAY**

Dominick D. Santiago, of full age, certifies as follows:

1. I am the Owner of Champ Enterprises, LLC, ("Champ" or the "Debtor"), the debtor in the above-captioned matter. I make this certification in opposition to the motion of Wilmington Savings Fund Society, FSB d/b/a Christiana Trust ("Secured Creditor") for relief from the Automatic Stay as to the real property commonly known as 148 Lewis Street, Paterson, NJ (the "Property").

2. The Debtor has obtained a contract to sell the Property for \$430,000.00. Contemporaneously with the filing of this certification, the Debtor has filed a motion with this court seeking authority to sell the property pursuant to Bankruptcy Code Sec. 363(b). the Debtor anticipates closing the sale within 5 – 7 day of the entry of an order authorizing the sale.

3. The sale contemplated by the debtor will result in payment of the Secured Creditor's mortgage claim and all other lines covering the property in full, at the closing. Further, the sale is

expected to produce enough to enable the debtor to pay all general unsecured and administrative claims in this case.

4. As a sale of the Property is imminent, and will benefit Secured Creditor, the Debtor and all other parties in interest, the Debtor respectfully submits that this Court should deny Secured Creditor's motion and permit the sale to proceed.

WHEREFORE, the Debtor respectfully requests this Court to deny Secured Creditor's motion for relief from the automatic stay.

I certify that the foregoing statements are true. I am aware that if the foregoing statements are willfully false, I am subject to punishment.

Dated: 4/4/2024

/s/ Dominick D. Santiago
Dominick D. Santiago